

EXHIBIT A

From: [Phillips, Jessica E](#)
To: ["Eric L. Cramer"](#); [Patrick F. Madden](#); [Isaacson, William A](#)
Cc: [Phillips, Jessica E](#)
Subject: RE: Briefing on Zuffa's Discovery Motions
Date: Friday, November 3, 2023 5:29:42 PM

Eric,

Unfortunately, we can't agree to the schedule you proposed. We plan to file a motion for a briefing schedule proposing the schedule for consolidated briefing on the motion to reopen and the motion for cross use of discovery that we are seeking: your consolidated opposition brief due on November 10 and our consolidated reply due on November 15.

Best,

Jessica E Phillips | Partner
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From: Eric L. Cramer <ecramer@bm.net>
Sent: Friday, November 3, 2023 5:03 PM
To: Phillips, Jessica E <jphillips@paulweiss.com>; Patrick F. Madden <pmadden@bm.net>; Isaacson, William A <wisaacson@paulweiss.com>
Subject: RE: Briefing on Zuffa's Discovery Motions

Jessica, I'm following up on our discussion today. Given that our initial brief is due very soon, would you be able to let us know today whether we will have an agreement on briefing along the lines we discussed?

Thanks,

Eric

Eric L. Cramer / *Chairman*

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From: Phillips, Jessica E <jphillips@paulweiss.com>
Sent: Friday, November 3, 2023 9:43 AM
To: Eric L. Cramer <ecramer@bm.net>; Patrick F. Madden <pmadden@bm.net>; Isaacson, William A

<wisaacson@paulweiss.com>

Subject: RE: Briefing on Zuffa's Discovery Motions

Eric,

Let's have a call. I'm with my 3rd grader on a field trip this morning but can call you at 12:30 pm ET if that works.

Thanks,

Jessica E Phillips | Partner

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From: Eric L. Cramer <ecramer@bm.net>

Date: Friday, Nov 03, 2023 at 9:34 AM

To: Phillips, Jessica E <jphillips@paulweiss.com>, Patrick F. Madden <pmadden@bm.net>, Isaacson, William A <wisaacson@paulweiss.com>

Subject: RE: Briefing on Zuffa's Discovery Motions

Jessica,

This will not work for us. You have already submitted two briefs relating to extending the discovery period in Le, and we have submitted none. Plaintiffs are currently drafting those two briefs (plus our summary judgment opposition). Absent an agreement, under the status quo, Plaintiffs will be forced to submit two briefs on these discovery issues, one on November 9 and another at some point prior to the hearing. I'm not sure how that works out better for anyone, frankly, but that's where we are. Let me know if you'd like to discuss.

--Eric

Eric L. Cramer / *Chairman*

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From: Phillips, Jessica E <jphillips@paulweiss.com>

Sent: Thursday, November 2, 2023 6:09 PM

To: Patrick F. Madden <pmadden@bm.net>; Isaacson, William A <wisaacson@paulweiss.com>

Cc: Eric L. Cramer <ecramer@bm.net>; Phillips, Jessica E <jphillips@paulweiss.com>

Subject: RE: Briefing on Zuffa's Discovery Motions

Patrick,

We are amenable to consolidating the briefing on the motions as you propose, but with a slightly different schedule. We propose that Plaintiffs' consolidated opposition be due on November 9 and Defendants' consolidated reply be due on November 15. That way the court has two days to read everything before the hearing on November 17.

Let us know your thoughts.

Best,

Jessica E Phillips | Partner

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From: Patrick F. Madden <pmadden@bm.net>

Sent: Thursday, November 2, 2023 10:08 AM

To: Isaacson, William A <wisaacson@paulweiss.com>; Phillips, Jessica E <jphillips@paulweiss.com>

Cc: ecramer@bm.net

Subject: Briefing on Zuffa's Discovery Motions

Bill and Jessica,

Presently, Plaintiffs' brief in opposition to Zuffa's motion to treat discovery in *Johnson* as if taken in *Le* is due November 9 and Plaintiffs' opposition to Zuffa's motion to reopen discovery in *Le* is due November 21.

As you know, last night the Court set a hearing on Zuffa's motion to reopen discovery in *Le* for November 17, four days before our opposition is due.

We would like to propose a joint motion to amend the briefing schedules and page limits for both motions as follows:

Plaintiffs will file an omnibus opposition that responds to both motions to be filed November 13. The page limit for Plaintiffs' omnibus opposition would be 30 pages.

Zuffa may then file an omnibus reply brief in support of both motions prior to the November 17 hearing. The page limit for Zuffa's omnibus reply would be 15 pages.

Please let us know your position. We can prepare the joint submission if you agree.

Patrick F. Madden / *Shareholder*

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